WHITE & CASE

White & Case LLP 1155 Avenue of the Americas New York, New York 10036-2787 Tel + 1 212 819 8200 Fax + 1 212 354 8113 whitecase.com

Direct Dial + 1 212 819 8853

kenneth.caruso@whitecase.com

April 3, 2015

## VIA ECF

Hon. Alvin K. Hellerstein United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

Vera v. Republic of Cuba No. 12 Civ. 1596 (AKH)

Dear Judge Hellerstein,

I represent Banco Bilbao Vizcaya Argentaria, S.A. ("BBVA"). BBVA is filing a motion for a stay of discovery pending appeal from this Court's Opinion and Order, dated March 17, 2015, denying BBVA's motion for reconsideration and ordering BBVA to provide Aldo Vera with discovery, Docket No. 739, and from this Court's prior order for discovery, dated September 10, 2014. Docket No. 677. The deadline for BBVA to comply with Vera's subpoena is May 1, 2015. On our motion for a stay of discovery pending appeal, we have fixed the schedule per Local Rule 6.1. However, I wish to inform the Court that I intend to speak to Vera's counsel, Mr. Swift, regarding the schedule, and I reserve the right to ask the Court to shorten the schedule.

Respectfully,

Kenneth A. Caruso

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Partner

ALMATY ANKARA ASTANA BEIJING BERLIN BRATISLAVA BRUSSELS BUDAPEST DOHA DÜSSELDORF FRANKFURT GENEVA HAMBURG HELSINKI HONG KONG ISTANBUL JOHANNESBURG LONDON LOS ANGELES MADRID MEXICO CITY MIAMI MILAN MOSCOW MUNICH NEW YORK PARIS PRAGUE RIYADH SÃO PAULO SHANGHAI SILICON VALLEY SINGAPORE STOCKHOLM TOKYO UAE WARSAW WASHINGTON, DC